

James A. Patten (ID No. 1191)
Daniel L. Snedigar (ID No. 9428)
PATTEN, PETERMAN, BEKKEDAHL & GREEN, P.L.L.C.
2817 Second Ave. North, Suite 300
Billings, MT 59101
Telephone: (406) 252-8500
Facsimile: (406) 294-9500
E-mail: apatten@ppbglaw.com
dsnedigar@ppbglaw.com

Peter W. Ito (Pro hac vice)
ITO LAW GROUP, P.C.
1550 Larimer Street, Suite 667
Denver, Colorado 80202
Telephone: 720-281-5294
Email: peter@itolawgroup.com

Attorneys for Defendants, Project Spokane and Sean Walsh

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MONTANA
MISSOULA DIVISION**

STEVE NELSON, MICHAEL
BOEHM AND BONNER PROPERTY
DEVELOPMENT, LLC.,

Plaintiffs,

vs.

PROJECT SPOKANE, LLC,
and SEAN WALSH,

Defendants.

No. CV 20-82-M-DWM

**UNOPPOSED MOTION
AND MEMORANDUM
FOR WITNESS TO
APPEAR BY VIDEO**

Defendants in this action, PROJECT SPOKANE LLC and SEAN WALSH, by and through counsel, submit this unopposed Motion and Memorandum to allow Sean Walsh to appear telephonically or by video link at the hearing on Preliminary Injunction scheduled for June 25, 2020 at 9:00am. (see Doc. 10).

Mr. Walsh is a resident of San Juan, Puerto Rico, and respectfully requests permission to appear by remote means in order to avoid exposure to the present COVID-19 pandemic through the extensive air travel entailed in appearing personally in Missoula, Montana. Further, defendant Walsh has already obtained an Order of this Court allowing him to appear via video in the hearing in *Energy Keepers, Inc. v. Hyperblock, LLC*, CV 20-76-M-DWM, set for the same date and time.

Counsel for the Plaintiffs, Quentin Rhoades, was consulted regarding their position on this request, and affirmed via email that they had no opposition to Mr. Walsh being allowed to appear remotely in this matter.

//

//

//

//

//

DATED this 19th day of June, 2020.

Peter W. Ito (Pro hac vice)
ITO LAW GROUP, P.C.
1550 Larimer Street, Suite 667
Denver, CO 80202

**PATTEN, PETERMAN, BEKKEDAHL
& GREEN, PLLC**
2817 2nd Avenue North, Ste. 300
P.O. Box 1239
Billings, MT 59101

By: /s/JA Patten
James A. Patten
Attorneys for Defendants,
Project Spokane LLC and Sean Walsh

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2020 a true and correct copy of the foregoing **UNOPPOSED MOTION AND MEMORANDUM FOR WITNESS TO APPEAR TELEPHONICALLY OR BY VIDEO** was served on the following persons by the following means:

1, 2 CM/ECF
 Hand delivery
 Mail
 Overnight Delivery Service
 Fax
 E-mail

1. Clerk, U.S. District Court
2. Quentin M Rhoades
Robert Erickson
Rhoades, Siefert & Erickson PLLC
430 Ryman Street
Missoula, MT 59802
qmr@montanalawyer.com
erickson@montanalawyer.com

/s/ JA Patten

For Patten, Peterman, Bekkedahl & Green